



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

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n Ritchie
n Counsel
356-0885

MURIEL GOODE-TRUFANT
Acting Corporation Counsel

September 10, 2024

Via ECF

Magistrate Judge Stewart D. Aaron
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Williams, Jr. v. City of New York et al
Civil Action No.: 23-cv-02700-JPO-SDA

Your Honor:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants the above-referenced matter. I write to respectfully request a 45-day extension to respond to the Amended Complaint (ECF No. 7) and a request to adjourn the Initial Pretrial Conference (Scheduling Order, ECF No. 46) scheduled for October 23, 2024 by 45 days. Because Plaintiff is incarcerated, this Office was unable to obtain his consent to these requests.

Presently, Defendants' response to the Complaint is due by September 11, 2024. I respectfully request the Court extend that deadline by 45 days or to October 26, 2024. Plaintiff Alexander Williams Jr. has reached out in the first instance to the undersigned following the issuance of Judge Oetken's Opinion and Order (ECF No. 45) on Defendant's Motion to Dismiss and has evinced an interest in exploring the possibility of settlement with the undersigned. The additional time is necessary to confer with the DOC on this, further investigate the Complaint's allegations, explore the possibility of settlement with Mr. Williams, Jr., if appropriate, and prepare a full and adequate response.

This is Defendants' first request for an extension to answer to the Complaint. While there is currently an Initial Pretrial Conference scheduled for October 23, 2024, there will be little to no negative impact on the litigation of this matter, nor will there be any prejudice to the Plaintiff in granting this request as the parties both have stated an interest in exploring the possibility of settlement. Defendants further request that the Initial Pretrial Conference be adjourned by the same 45-day extension or December 9, 2024 in order to allow the parties to attempt to settle Plaintiff's claims without further Court intervention at this time.

Defendants thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Bryn Ritchie
Bryn Ritchie
Assistant Corporation Counsel

VIA First Class Mail:
Alexander Williams, Jr.
DIN#23B3963
Sing Sing C.F.
354 Hunter Street
Ossining, NY 10562
PRO SE

Defendants' request at ECF No. 47 for an extension of time to Answer and adjourn the initial pretrial conference until a later date is GRANTED. Defendants shall file their Answer to the Amended Complaint no later than October 26, 2024.

The initial pretrial conference presently scheduled for October 23, 2024, is ADJOURNED and rescheduled to take place on Friday, December 13, 2024, at 2:00 p.m. The conference shall be conducted by telephone. At the scheduled time, the parties shall each separately call (888) 278-0296 (or (214) 765-0479) and enter access code 6489745. The parties are reminded to confer and comply with the prior Order of the Court that scheduled the initial pretrial conference. (8/28/24 Order Scheduling Initial Pretrial Conf., ECF No. 46.)

Because one of the grounds for Defendants' extension request includes contemplation of settlement, no later than October 9, 2024, the parties are directed to confer and file a status letter apprising the Court on the status of settlement discussions and if the parties are prepared to proceed with further settlement discussions, supply four dates the parties are available for a settlement conference before the undersigned, and whether there is a preference to proceed in the morning, afternoon or both for each of the selected dates.

SO ORDERED.

Dated: September 11, 2024

